



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF AIR POLLUTION CONTROL
William R. Snodgrass Tennessee Tower, 15th Floor
312 Rosa L. Parks Avenue
Nashville, TN 37243
(615) 532-0554 Voice or (615) 532-0614 FAX

March 24, 2020

Certified Article Number

9414 7266 9904 2154 5131 10

SENDER'S RECORD

Mr. Stephen Scott, President
Volunteer Environmental Services, LLC
549 East Pass Road, STE F
Gulfport, MS 39507

Re: Construction Permit Application
Covington Waste Water Treatment Plant
298 Witherington Drive, Covington, TN 38019
Emission Source Reference No. 84-0124-01/Permit No. 977924

Dear Mr. Scott:

Your construction permit application dated January 13, 2020, for modification to the feedstock for the existing gasifier unit was received on January 14, 2020. Additional requested information was received February 24 and 26, 2020. Please be advised that construction or modification of the source cannot begin until you are in receipt of the issued construction/modification permit. A determination has been made that the application is incomplete for the following reason(s):

Additional information is needed as follows:

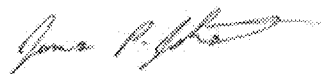
1. Revised APC 102 form with reference to pharmaceutical waste removed from item 6.
2. If available, a copy of the source test report for the gasification unit in Kuznica, Poland (translated to English), and information on system design if that is not included in the report. The Division cannot assess the suitability of the provided emission factors for the Covington unit without additional information about the Polish unit's design and the source test parameters. The system design information required includes, at a minimum; type of gasification unit tested, process description, maximum heat input rate, maximum input capacity (ton/day), operating temperature profile, and oxygen concentration profile.
3. Emissions estimates/calculations for carbon monoxide.
4. The brief regulatory analysis provided in the additional information received February 24, 2020, does not substantively demonstrate that the existing unit at Covington would be exempt from 40 CFR 60, Subpart Ec — Standards of Performance for New Stationary Sources: Hospital/Medical/Infectious Waste Incinerators under the proposed conditions. Determinations regarding the applicability of the exemption at 40 CFR §60.50c(f) for "any pyrolysis unit" have been made on a case-by-case basis by the Environmental Protection Agency (EPA). The information contained in your application suggests that the modification to the method of operation of the unit as proposed would be subject to 40 CFR 60, Subpart Ec. As such, the application should be updated to address compliance with 40 CFR 60, Subpart Ec, or provide a determination in writing from EPA that the exemption at 40 CFR §60.50c(f) is valid for the unit under the conditions for which you propose the unit to be operated.

Please submit the additional information to the Technical Secretary at the letterhead address or email the information to Air.Pollution.Control@TN.gov in Adobe pdf format within 60 days of receipt of this letter so that the Division can review the revised application for completeness. If additional deficiencies are identified, you will be able to correct them within the remainder of the 180-day period that began on February 3, 2020 (the date you received the first incomplete letter dated January 29, 2020), as provided in subparagraph 1200-03-26-.02(4)(d) of the Tennessee Air Pollution Control Regulations.

It is the express intent of the Tennessee Air Pollution Control Board that the 180-day permit application correction period is not to be construed by an applicant as permission to construct or modify a source without the permit required by Division Rules. If you fail to submit a complete application within this 180-day time period, all construction permits shall be denied and any fees forfeited.

If you have any questions concerning this correspondence, please contact Justin Dolzen at (615) 532-0575 or Justin.Dolzen@tn.gov. Your Facility ID is **84-0124**, please reference this number in any further correspondence with the Division.

Sincerely,



James P. Johnston, P.E.
Deputy Director
Permitting & Regulatory Development